

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

| | | |
|--|---|-----------------------|
| CATHY CARTER, |) | |
| |) | |
| <i>Plaintiff,</i> |) | |
| |) | |
| v. |) | Civil Action No.: |
| |) | 1:20-cv-01674-TWT-JSA |
| |) | |
| PAUL HOWARD, in his individual and official capacity, |) | |
| |) | |
| |) | |
| <i>Defendants.</i> |) | |

**CONSENT MOTION FOR EXTENSION OF TIME
FOR PLAINTIFF CATHY CARTER TO RESPOND TO DEFENDANT
PAUL HOWARD’S MOTION FOR SUMMARY JUDGMENT**

COMES NOW, Plaintiff Cathy Carter, by and through undersigned counsel, and hereby files this Consent Motion for Extension of Time for Plaintiff Cathy Carter to Respond to Defendant Paul Howard’s Motion For Summary Judgment. **Defendant Paul Howard consents to the filing of this motion, and the extension requested herein,** from November 21, 2022, to December 5, 2022. Plaintiff states the following:

1. Counsel for Plaintiff wanted to write an email to the Honorable Judge as to not put Counsel’s health concerns in public record but was able to discuss with Chambers about his situation.

2. Plaintiff is undergoing serious medical conditions in which one of the two aspects will be clarified on Monday, November 28, 2022.
3. Thus, Plaintiff seeks an extension to respond to Defendant's Motion for Summary Judgment through December 5, 2022.
4. Counsel for Plaintiff has conferred with Defendant. Defendant consented to this requested extension of time to respond.

CONCLUSION

Based on the above, Plaintiff requests that this Court grant this Motion and order that Plaintiff's deadline to respond to Paul Howard's Motion For Summary Judgment be extended from November 21, 2022 through December 5, 2022. A proposed order is attached for the Court's convenience.

Respectfully submitted this 21st day of November 2022,

/s/ Mario B. Williams
Mario B. Williams (Ga # 235254)

HDR, LLC
44 Broad Street NW, Suite 200
Atlanta, GA 30303
(404) 254-0442
mwilliams@hdrattorneys.com

Pursuant to Local Rule 7.1(D), this is to certify that the foregoing has been prepared using Book Antiqua 13-point font in compliance with Local Rule 5.1.

/s/ Mario B. Williams
Mario B. Williams (Ga # 235254)

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
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CATHY CARTER,

Plaintiff,

V.

Civil Action No.:
1:20-cv-01674-TWT-JSA

PAUL HOWARD, in his individual and official capacity,

Defendants.

CERTIFICATE OF SERVICE

I hereby certify that on this day I electronically filed the foregoing *CONSENT MOTION FOR EXTENSION OF TIME FOR PLAINTIFF CATHY CARTER TO RESPOND TO DEFENDANT PAUL HOWARD'S MOTION FOR SUMMARY JUDGMENT* with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all counsel of record.

Respectfully submitted this 21st day of November 2022,

/s/ Mario B. Williams
Mario B. Williams (Ga # 235254)

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CATHY CARTER,

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PAUL HOWARD, in his individual and official capacity,

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Civil Action No.:
1:20-cv-01674-TWT-JSA

PROPOSED ORDER

Before the Court is Plaintiff's *Consent Motion for Extension of Time for Plaintiff Cathy Carter to Respond to Defendant Paul Howard's Motion For Summary Judgment*. Having duly considered the motion and for good cause shown, the Court GRANTS this Motion, affording Plaintiff through December 5, 2022, to respond to Defendant.

This ____ day of November 2022.

Justin S. Anand
United States Magistrate Judge